

December 16, 2024

VIA ELECTRONIC MAIL
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Sherri L. Golden, RMC
Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: In the Matter of the Community Solar Energy Program
BPU Docket No. QO22030153

Dear Secretary Golden:

Attached are comments of Atlantic City Electric Company in the above-referenced matter, which are being filed using the Board of Public Utilities' Public Document Search tool under BPU Docket No. QO22030153.

Feel free to contact the undersigned with any questions.

Respectfully submitted,



Michael Wallace

On behalf of Atlantic City Electric Company

Enclosure

Atlantic City Electric Company

Responses to the
New Jersey Board of Public Utilities'
Community Solar Year 1 Request for Information
BPU Docket No. QO22030153

December 16, 2024

1. **What parameters used in the modeling for the ADI Program's one-year refresh differ between community solar projects and projects in the market segments for small and large net-metered non-residential projects located on rooftop, carport, canopy, and floating solar?**

Key group:

Answer: No response

2. **What cost adjustments should be considered for the community solar market segment?**

Answer: No response

3. **Are different incentives required for community solar projects located in different EDC territories or with other characteristics?**

Answer: No response

4. **The Inflation Reduction Act increased federal tax credits to 30%, with the possibility for increased incentives for projects using domestic content, projects sited in energy communities, and projects qualifying for the Low-Income Communities Bonus Credit Program. How should these changes be accounted for in modeling incentive requirements for community solar projects?**

Answer: Atlantic City Electric ("ACE" or "the Company") supports NJ Clean Energy goals and believes that the NJ BPU plays an important role in supporting access for Community Solar Energy Program (CSEP) to all forms of funding.

5. **Does the pace of registration submission into the CSEP and subscription of the full capacity allocation support a change in incentive level from the initial value of \$90 per megawatt-hour?**

Answer: No response

6. **How has the Community Engagement and Subscriber Acquisition Plan influenced project development and enrollment of LMI subscribers?**

Answer: No response

7. **How has the interconnection process influenced project registration and advancement to construction?**

Answer: The interconnection process has significantly influenced project registration and advancement to construction. To accommodate BPU-required ad-hoc conditional approvals, ACE had to adjust its previously established interconnection process, resulting in inefficiencies in ACE's interconnection queue as projects must now obtain conditional approval before CSEP registration. The requirement forces all proposed projects, whether ultimately approved by the Board or not, into the formal interconnection queue, triggering resource-intensive technical reviews and unnecessary capacity reservations.

Requiring a completed Pre-Application Report for CSEP registration instead of conditional approval would increase efficiency in queue positioning. The Pre-Application Report provides critical feasibility insights without placing projects in the formal queue prematurely. This change would preserve the integrity of ACE's interconnection process, streamline project registration, and prevent delays caused by iterative reviews and capacity reallocation. Please see ACE's CSEP comments filed December 6, 2024 for a more detailed discussion of the issue and solution.

8. **Under existing project development and interconnection processes, how does the project completion deadline of 18 months, or 24 months for projects located on a landfill or contaminated site, with the possibility of a six-month extension affect registration in the CSEP?**

Answer: The project completion deadline of 18 months (or 24 months with the potential for a six-month extension) impacts registration in the CSEP by creating misaligned expectations and timelines. ACE recommends that the deadline requirement begin when the interconnection agreement is fully executed, and the required deposit is submitted, rather than on the registration date. This adjustment alleviates a gap that often exists between registration and the point when agreements and deposits are finalized. This time lapse can result from extended reviews, negotiations, or technical requirements, making it impractical to tie the completion deadline to the registration date.

Additionally, certain projects—particularly those requiring substantial system upgrades—may face construction timelines that extend beyond the prescribed deadlines. The current requirement for conditional approval prior to registration exacerbates these issues, as projects must complete resource-intensive interconnection reviews prematurely to satisfy registration requirements. This disrupts the interconnection queue, leading to inefficiencies and delays for all projects in the queue, including those outside the CSEP.

Replacing the conditional approval requirement with a completed Pre-Application Report for CSEP registration would mitigate these challenges. The Pre-Application Report provides essential feasibility data without necessitating formal queue placement or extended engineering studies. This modification would allow timelines to be determined based on finalized agreements and deposits, giving EDCs the ability to establish realistic schedules for necessary system upgrades and align with the realities of project development. Please see ACE's CSEP comments filed December 6, 2024 for a more detailed discussion of the issue and solution.

9. **What other issues should be considered in the one-year program review?**

Answer: See Q7 and Q8 above, ACE recommends that a Pre-Application Report is required for CSEP registration instead of the current conditional approval. Furthermore, the assigned queue position should be obtained at the conditional approval step of the application process. This will allow both EDC's and Developers to realize efficiencies in the timeline and align with the 18-24 month timeline. Please see ACE's CSEP comments filed December 6, 2024 for a more detailed discussion of the conditional approval issue and solution and for additional issues that ACE identified in the first year of the program.